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ATTORNEY FOR DEFENDANT
LIBORIO RUIZ LOPEZ, JR.

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CR.-S-03-362-GEB
PLAINTIFF,)	
v.)	STIPULATION AND PROPOSED ORDER
)	TO CONTINUE STATUS CONFERENCE
LIBORIO RUIZ LOPEZ, JR.,et al.,)	
)	
DEFENDANTS.)	

Plaintiff United States of America, by its counsel, Assistant United States Attorney, Mr. Phillip A. Talbert, and defendant Liborio Ruiz Lopez, Jr., by his counsel James R. Greiner, hereby stipulate and agree that the status conference calendared for **Friday, June 16, 2006, at 9:00 a.m.** before the Honorable District Court Judge Garland E. Burrell, Jr. shall be continued to **Friday, July 28, 2006, at 9:00 a.m.**

Time can be excluded from the speedy trial act due to the fact that the government and the defendant are continuing in the process of discussions and negotiations in a good faith effort and attempt to resolve this matter short of trial; the discussions are progressing and in good faith, both parties have exchanged proposals to resolving the matter and those are being considered by both sides; the government and the defense continue to have discussions regarding this case and have had face to face meetings which were very productive and both sides are diligently working toward a

1 resolution in this case short of trial; the additional time is needed to move to resolve the case;
2 investigation by the parties is on going during the good faith efforts at negotiating a resolution short
3 of trial; the parties have been sharing information and continue to share information in the on going
4 good faith efforts at resolving this matter; when new information is presented it is being investigated
5 by both sides.

6 The parties stipulate and agree that time shall be excluded **through Friday, July 28, 2006,**
7 **under Title 18 section 3161(h)(8)(B)(ii) and Local Code T-4.**

8 Respectfully submitted,

9 MCGREGOR W. SCOTT
10 UNITED STATES ATTORNEY

11 /s/ PHILLIP A. TALBERT by telephone authorization

12 DATED: 6-14-06

13 PHILLIP A. TALBERT
14 ASSISTANT UNITED STATES ATTORNEY
15 ATTORNEYS FOR THE PLAINTIFF

16 /s/ JAMES R. GREINER

17 DATED: 6-14-06

18 JAMES R. GREINER
19 ATTORNEY FOR DEFENDANT LOPEZ, JR.

20 **ORDER**

21 **FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.**

22 Dated: June 19, 2006

23 /s/ Garland E. Burrell, Jr.
24 GARLAND E. BURRELL, JR.
25 United States District Judge
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